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January 3, 2007

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NEW JERSEY

DELAWARE

RE: *DeSouza v. Landmark Engineering et al.*,
U.S.D.C. – D. Del. – No. 05-CV-787


Gentlemen:

I previously served you with Defendant Landmark Engineering, Inc.'s Interrogatories in this matter and the deadline for your clients' answers has passed. Please provide the answers to me by January 19, 2007 so that I may avoid filing a motion to compel their production. Also, I was not able to locate a copy of your clients' initial discovery disclosures. Please forward a copy to me.

In prior correspondence I informed you that Landmark Engineering had absolutely no involvement with the activities that led to your client's accident. In light of the fact that the Court scheduled Mediation for August, it appears that this case is not headed to a quick resolution. Therefore, I need the answers to my discovery requests because I intend to move for summary judgment.

I am willing to meet with you informally, or to make a representative of Landmark available for a deposition if you prefer a formal setting, to demonstrate that my client does not belong in this case. Please let me know your position with regard to this proposal.

Sincerely,



ROBERT D. ARDIZZI

\rda

cc: Landmark Engineering
Harford Mutual Insurance Company